

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO (DAYTON)**

IN RE:	*	CASE NO. 19-30822
TAGNETICS INC.	*	JUDGE: Humphrey
INVOLUNTARY DEBTOR	*	CHAPTER 7
	*	MOTION TO COMPEL PRODUCTION OF DOCUMENTS

MOTION TO COMPEL THE PRODUCTION OF DOCUMENTS

NOTICE OF MOTION PER LBR 9013

PLEASE READ THIS NOTICE CAREFULLY

You are hereby notified that Christopher L. Wesner has filed papers with the Court requesting an Order to Compel Tagnetics Inc. to produce the combined discovery requested by Petitioning Creditors Kayser Ventures Ltd. and S-Tek Inc. (hereinafter called the "Motion").

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the Motion, or if you want the Court to consider your views on the Motion, **then on or before twenty-one (21) days from the date set forth in the certificate of service for the Motion.** you or your attorney must file with the Court a response explaining your position by making your response by regular US Mail to:

Clerk of Court's
U.S. Bankruptcy Court Clerk's Office
120 West Third Street, Dayton OH 45402

or your attorney must file a response using the Court's ECF System.

Copies of the Court's Administrative Procedures for electronic filings can be found at the following website:
<http://www.ohsb.uscourts.gov>

You must file the response early enough so the Court will receive it on or before the date set forth above.

You must also send a copy of your response to Christopher L. Wesner. You may either electronically serve Roger E. Luring through the Court's ECF System, or by regular US Mail to:

Christopher L. Wesner
Miller Luring Venters & Wesner Co., LPA
314 West Main Street, Troy OH 45373

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief without further hearing or notice.

07/11/19
Date of Issuance

/s/ Christopher L. Wesner
Christopher L. Wesner

MOTION

Here comes Petitioning Creditors Kayser Ventures Ltd. and S-Tek Inc. by and through their counsel Christopher L. Wesner and hereby requests the Court to issue an Order to compelling Tagnetics Inc. to produce the documents requested through discovery. Kayser Ventures Ltd. and S-Tek Inc. made a combined Interrogatories and Request for Production of Documents on or about May 23, 2019. A telephonic pretrial occurred on or about June 10, 2019, at that time all parties agreed to produce limited discovery by June 28, 2019. On or about June 17, 2019 Attorney Wesner assented to the Agreed Order on behalf of Kayser Ventuers Ltd. and S-Tek Inc. At this time, no discovery whatsoever has been provided as of 7/10/2019, by Tagnetics Inc. and with the trial date looming on July 29, 2019, it is imperative that Tagnetics Inc. produce the requested discovery.

Dated: July 11, 2019

Respectfully submitted,
/s/ Christopher L. Wesner

Miller, Luring, Venters, Wesner Co. LPA
314 W. Main Street
Troy, OH 45373
Phone: (937) 339-8001
Fax: (937) 339-5440
Email: chriswesnerlaw@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that this document was served by email (when the email address of the party was available to me) and regular U.S. mail this day of July 11, 2019 upon the following:

Stephen B. Stern
238 W. Street
Annapolis, MD 21401
Counsel for Tagnetics Inc.

Robert Kracht
101 W. Prospect Avenue, Suite 1800
Cleveland, OH 44115
Counsel for Tagnetics Inc.

Kenneth W Kayser
PO Box 115
Catawba, VA 24070

Ronald E. Early
6429 Winding
Tree Dr New
Carlise, OH
45344

Kayser Ventures Ltd
1872 Pratt Dr
Ste 1800
Blacksburg, VA 24060

Jonathan Hager
2170 River Oaks Drive
Salem, VA 24153

Robert Strain
427 Artell St.
Marcengo, IL 60512

S-Tek Inc.
1 100 Wayne St
Suite 5000
Troy, OH 45373

John White
Tagnetics Inc.
635 Olympic Dr.
Troy, OH 45373

/s/ Christopher L. Wesner (0082699)